

Hunters Capital, LLC v. City of Seattle

30(b)(6) Jennifer Winkler

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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HUNTERS CAPITAL, LLC, et al.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 20-cv-00983-TSZ
	)	
CITY OF SEATTLE,	)	
	)	
Defendant.	)	

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VIDEOTAPED VIDEOCONFERENCE 30(b)(6) DEPOSITION  
UPON ORAL EXAMINATION OF  
CITY OF SEATTLE  
(JENNIFER WINKLER)

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Seattle, Washington

(All participants appeared via videoconference.)

DATE TAKEN: JANUARY 6, 2022

REPORTED BY: CINDY M. KOCH, RPR, CRR, CCR #2357

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1 A. I believe we created it in 2021.

2 Q. Okay. I'm going to drop -- 2020, you said?

3 A. 2021.

4 Q. Okay. Ms. Winkler, I've dropped into the chat  
5 an exhibit for you to take a look at. Please download  
6 that, and let me know once you've had a chance to take a  
7 look at it.

8 MR. CRAMER: Gabe, are you marking this as  
9 Exhibit 2?

10 MR. REILLY-BATES: Yes. We'll mark this as  
11 Exhibit 2, Madam Court Reporter, please.

12 (Exhibit No. 2 marked.)

13 A. I have reviewed it.

14 BY MR. REILLY-BATES:

15 Q. Do you recognize this advice sheet?

16 A. Yes.

17 Q. Could you please tell us what this advice sheet  
18 is.

19 A. This advice sheet is regarding text messages,  
20 and was created by my office to give City employees a  
21 little bit more in-depth understanding about text  
22 messages and their recordkeeping responsibilities.

23 Q. And so you were -- you were involved --  
24 personally involved in drafting this document; correct?

25 A. I drafted this document.



## DECLARATION

**CASE NAME:** Hunters Capital, LLC v. City of Seattle

**DATE TAKEN:** 1/6/2022

**WITNESS:** 30(b)(6) Jennifer Winkler

I declare under penalty of perjury under the laws of the State of Washington that I have read my within deposition, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the ERRATA flyleaf page hereof.

*Jennifer Winkler*

30(b)(6) Jennifer Winkler

Signed on the 31 day of January, 2022.